

The Honorable Marsha J. Pechman

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

COUNTRY MUTUAL INSURANCE
COMPANY, A FOREIGN COMPANY,

Plaintiff,

v.

ATLASRHINO, INC. DBA ZENAPTIC
CHIROPRACTIC, A WASHINGTON
CORPORATION, AND TROY DREILING,
AN INDIVIDUAL AND THE PRESIDENT
OF ATLASRHINO, INC.,

Defendants.

ATLASRHINO, INC. DBA ZENAPTIC
CHIROPRACTIC, A WASHINGTON
CORPORATION, AND TROY DREILING,
AN INDIVIDUAL AND THE PRESIDENT
OF ATLASRHINO, INC.,

Counter Claimants,

v.

COUNTRY MUTUAL INSURANCE
COMPANY, A FOREIGN COMPANY,,

Counter Defendant.

Case No. 3:24-cv-05853-MJP

**STIPULATED MOTION AND ORDER TO
EXTEND BRIEFING DEADLINES RE
PLAINTIFF AND COUNTER DEFENDANT
COUNTRY MUTUAL INSURANCE
COMPANY'S 12(B)(6) MOTION TO
DISMISS DEFENDANTS' COUNTERCLAIM
RE BAD FAITH [DKT. 27]**

**NOTE ON MOTION CALENDAR
RE-NOTED TO: FEBRUARY 14, 2025**

(WITHOUT ORAL ARGUMENT)

STIPULATED MOTION AND ORDER TO EXTEND
BRIEFING DEADLINES RE PLAINTIFF AND COUNTER
DEFENDANT'S 12(B)(6) MOTION TO DISMISS
COUNTERCLAIM - CASE NO. 3:24-CV-05853-MJP

SELMAN LEICHENGER EDSON
HSU NEWMAN & MOORE LLP
600 University Street, Suite 2305
Seattle, WA 98101
Tel.: 206.447.6461

Plaintiff and Counter Defendant COUNTRY Mutual Insurance Company (“COUNTRY”) and Defendants AtlasRhino, Inc. dba Zenaptic Chiropractic and Troy Dreiling (“Defendants”) (collectively the “Parties”) by and through their counsel of record, hereby stipulate as follows:

The Parties are engaging in discussions regarding the issues presented in Defendants’ counterclaims and COUNTRY’s motion to dismiss in an effort to resolve these issues amicably. The Parties respectfully request additional time to explore such resolution.

Pursuant to Fed. R. Civ. P. 6(b), the Parties respectfully move this Court to extend the briefing schedule related to Plaintiff and Counter Defendant COUNTRY Mutual Insurance Company’s Rule 12(b)(6) Motion to Dismiss Defendants’ Counterclaim re Bad Faith [Dkt. 27] to coincide with the new noting date of March 14, 2025, per the Notice of Motion Re-noted filed by COUNTRY in the above-captioned case February 13, 2025 [Dkt. 29], as follows:

Briefing Deadline	Current Due Date	Revised Due Date
Defendants’ Response	February 21, 2025	March 7, 2025
COUNTRY’s Reply	February 28, 2025	March 14, 2025

In consideration of information presented in this stipulated motion, the Parties respectfully request this Court to enter an order extending the briefing deadlines, as set forth above.

IT IS SO ORDERED.

DATED this 18 day of February, 2025.



THE HONORABLE MARSHA J. PECHMAN
United States District Judge

STIPULATED MOTION AND ORDER TO EXTEND
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HSU NEWMAN & MOORE LLP
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Seattle, WA 98101
Tel.: 206.447.6461

1 *Stipulated to and Presented by:*

2 **SELMAN LEICHENGER EDSON**
3 **HSU NEWMAN & MOORE LLP**

4 By: s/ H. Matthew Munson
5 H. Matthew Munson, WSBA# 32019
6 Daehyun Kim, WSBA# 54955
7 600 University Street, Suite 2305
8 Seattle, WA 98101
9 Tel.: 206.447.6461
10 Email: mmunson@selmanlaw.com
11 dkim@selmanlaw.com

12 *Attorneys for Plaintiff and Counter Defendant*
13 *COUNTRY Mutual Insurance Company*

14 I certify that this memorandum contains 212
15 words, in compliance with the Local Civil Rules.

16 **PATERNOSTER FARNELL & GREIN, LLP**

17 By: s/ Gabriel J. Le Chevallier
18 Gabriel J. Le Chevallier, WSBA #62008
19 1030 SW Morrison Street
20 Portland, OR 97205
21 Tel.: 503.222.1812
22 Email: glechevallier@pfglaw.com

23 *Attorney for Defendants*

24
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26 STIPULATED MOTION AND ORDER TO EXTEND
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HSU NEWMAN & MOORE LLP
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Seattle, WA 98101
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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2025, I electronically filed the foregoing
**STIPULATED MOTION AND ORDER TO EXTEND BRIEFING DEADLINES RE
PLAINTIFF AND COUNTER DEFENDANT COUNTRY MUTUAL INSURANCE
COMPANY'S 12(B)(6) MOTION TO DISMISS DEFENDANTS' COUNTERCLAIM RE
BAD FAITH [DKT. 27]** with the Clerk of the Court using the CM/ECF system, which will send
notification of the filing to all counsel of record who receive CM/ECF notification.

DATED this 14th day of February, 2025.

Mia Tenorino

Mia Tenorino
Legal Secretary
mtenorino@selmanlaw.com

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